

FACT SHEET

Facility Name: Defense Depot Memphis Tennessee

Location: Shelby County, Tennessee

Address: 2163 Airways Boulevard
Memphis, Tennessee 38114

Owner: U.S. Department of the Army

Operator: Defense Logistics Agency
2001 Mission Drive
New Cumberland, Pennsylvania 17070-6950

Units: [All Solid Waste Management Units and Areas of Concern](#)

Installation ID Number: TN4 21 002 0570

Comment Period: Begins: August 13, 2004
Ends: September 27, 2004

Public Hearing: Date: September 21, 2004
Time: 6:30 p.m. (Central)
Location: South Memphis Senior Citizens Center
1620 Marjorie St., Memphis, TN

PURPOSE

Pursuant to Tennessee Rule 1200-1-11-.07(7)(d), this fact sheet is prepared for the draft hazardous waste corrective action permit renewal for the US Department of Army, owner of Defense Depot Memphis Tennessee, and the Defense Logistics Agency, the permit operator. The owner and operator are jointly referred to as permittee.

If issued, this permit renewal will continue to cover all applicable corrective action conditions under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101, et seq. and Tennessee Rule Chapter 1200-1-11, Hazardous Waste Management. The permit is prepared in accordance with the provisions of Rule 1200-1-11-.07.

FACILITY DESCRIPTION AND REGULATORY HISTORY

Site Location and Description: The Defense Depot Memphis Tennessee (DDMT), formerly known as the Defense Distribution Depot Memphis, Tennessee, is in southeastern Memphis, Tennessee, approximately 5 miles east of the Mississippi River and just northeast of Interstate 240 near the airport. The property consists of approximately 642 acres and includes two

components: the Main Installation (MI), which contains approximately 578 acres with open storage areas, warehouses, military family housing and outdoor recreational areas, and Dunn Field, which contains approximately 64 acres and includes former mineral storage and waste disposal areas.

The DDMT originated as a military facility in the early 1940s. Its initial mission and function was to provide stock control, materiel storage and maintenance services to the U.S. Army. In 1995, the DDMT was placed on the list of the Department of Defense (DoD) facilities to be closed under Base Realignment and Closure (BRAC) law. As required by the law, all of the DDMT property must be transferred (sold, leased) from the designated holding agency (i.e., owner). The US Army is considered the owner of the DDMT property. Storage and distribution of materiel for all U.S. military services and some civil agencies continued until the facility closed in September 1997.

Following closure, the Base Realignment and Closure Office of the US Army, located in Ft. Monroe, Virginia, became responsible for property dispositions (transfers). To date, three property transfers have been completed covering 381 acres. A fourth transfer for approximately 41 acres is in process. These four transfers include the majority of the DDMT not needed for implementation of remedial actions. The local re-use authority, Depot Redevelopment Corporation (DRC), has a 50-year master lease on the Main Installation. The DRC has completed over 20 subleases with commercial tenants covering over half of the Main Installation.

The entire DDMT property is currently zoned for Light Industrial Use. Land use controls have been established for all DDMT property with residual contamination above residential use criteria in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended. A Notice of Land Use Restrictions is currently being prepared in accordance with Tennessee statutory requirements for the Main Installation. A similar Notice will be prepared for Dunn Field upon completion of the remedial design. Under the Memphis and Shelby County Code, drinking water wells are prohibited on and within a half-mile of the DDMT property because it is a Superfund site.

Site History: The DDMT was officially activated on January 26, 1942, as the Memphis General Depot. Since that time, the DDMT's mission and function was to receive, store and distribute various commodities to the Armed Forces and civilian Agencies, when required. Included were supplies common to all U.S. military services and some civil agencies located primarily in the southeastern United States, Puerto Rico, and Panama. Stocked items included food, clothing, electronic equipment, petroleum products, construction materials, and industrial, medical, and general supplies. Approximately 4 million line items were received and shipped by the DDMT annually; total shipments amounted to about 107,000 tons of goods per year. The DLA operated the facility from 1963 until it closed in September 1997.

Environmental Regulatory Activities: Important events for the DDMT in regard to environmental regulatory activities include:

- In **January 1990**, the Environmental Protection Agency (EPA) Region 4 conducted a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) at DDMT

through a contract with A. T. Kearney, Inc. (EPA, 1990). The RFA resulted in the identification of 49 solid waste management units and 8 areas of concern at the facility.

- On **September 28, 1990**, the DDMT was issued hazardous waste (RCRA Part B) permit, numbered TNHW-053, for the storage of hazardous waste by TDEC. The Hazardous and Solid Waste Amendments (HSWA) portion of the permit issued by EPA, and the corresponding corrective action portion of the TDEC permit, included requirements for the identification and, if necessary, corrective action of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). Subsequent to issuing the permit, and in accordance with Section 120(d) (2) of CERCLA, and Title 42, Section 9620 (d)(2) of the United States Code (USC), EPA prepared a final Hazard Ranking System (HRS) Scoring Package for the facility.
- On **October 14, 1992**, based on the Final HRS score of 58.06, EPA added the DDMT to the National Priorities List (NPL) for federal facilities (57 Federal Register 47180 No. 199).
- On **March 6, 1995**, a Federal Facilities Agreement (FFA) under CERCLA Section 120, and RCRA, Sections 3008(h), and 3004(u) and (v), was entered into by EPA, TDEC and DLA. As part of the FFA, the Site Management Plan (SMP) identified a list of the original sites for investigation. A BRAC Cleanup Plan subsequently replaced the SMP and included the list of sites for further investigation under CERCLA. The FFA outlined the process for investigation and cleanup of the sites at the DDMT under CERCLA. The parties agreed that investigation and cleanup of releases from the sites, including formerly identified SWMUs and AOCs, would satisfy any RCRA corrective action obligation under the EPA HSWA permit and T.C.A Section 68-212-101 et seq. The lead agency for the CERCLA activities at the DDMT is the DLA. The regulatory oversight agencies are the EPA and the TDEC.
- In **July 1995**, the DDMT was identified for the closure under the BRAC process, which requires environmental restoration at the DDMT to comply with the requirements for property transfer under Public Law 101-510 of Title XXIX, Defense Base Closure and Realignment. Since then, environmental restoration activities have been funded under the BRAC account and are being conducted by DLA. After the DDMT was placed on the BRAC closure list, the City of Memphis and the Depot Redevelopment Corporation (DRC) worked together to plan and coordinate the reuse of the DDMT. The DRC conducted several public meetings during the preparation of its *Memphis Depot Redevelopment Plan* to obtain community feedback on future land use plans. The plan was approved in 1997.
- On **October 22, 1998**, TDEC terminated the storage portion of the hazardous waste permit (RCRA Part B permit) because the proposed storage unit was never constructed or operated. However, the corrective action portion of the permit and the corresponding EPA HSWA permit remained in effect, including the duty to reapply, 180 days prior to the expiration date of the permit. Even though corrective action for the SWMUs and AOCs at DDMT have been deferred to CERCLA, the FFA acknowledges the continuance and periodic updating of the status of units in the corrective action permit.

- In **February 2001**, the Record of Decision for the Main Installation received final approval, and in **April 2004**, the Record of Decision for Dunn Field received final approval by the FFA parties. Pursuant to the FFA, cleanup decisions have been made by the BRAC Cleanup team (DLA, EPA and TDEC) for the Main Installation and Dunn Field, and response actions have and will be taken to address releases of hazardous substances that may present a risk to human health and the environment.
- On **March 31, 2004**, DLA submitted to TDEC an application to renew the hazardous waste corrective action permit. EPA's corresponding HSWA permit did not require renewal because on December 26, 2000, the State of Tennessee received full authorization to implement, in lieu of EPA, the HSWA corrective action requirements.

Community Participation: The DDMT has performed public participation activities in accordance with the CERCLA and to the extent practicable the National Contingency Plan throughout the CERCLA site clean-up process. This includes monthly Restoration Advisory Board (RAB) meetings since 1994, numerous Community Involvement Sessions and public meetings, production of a bi-monthly newsletter and the establishment of information repositories, including an on-site Community Outreach Room.

SCOPE OF PERMIT

Issuance of the permit by TDEC will provide the state with the authority, if necessary, to require the owner and operator (permittee) to perform corrective action beyond that which is being done under CERCLA. In addition to corrective action, under the conditions of this permit, the permittee will also be required to notify of imminent hazards and as applicable, comply with the requirements developed under the land disposal restrictions. The permit, once issued, will be valid for 10 years, unless terminated earlier upon approval of the Commissioner.

Specific areas of the facility that are subject to corrective action are solid waste management units (SWMUs) and areas of concern (AOCs). SWMUs are any units that have been used for the treatment, storage or disposal of solid waste at any time, irrespective of whether the unit is or ever was intended for the management of solid waste. AOCs are any areas having a probable release of a hazardous waste or a hazardous constituent, which is not from a SWMU and is determined to pose a current or potential threat to human health or the environment.

For the purpose of corrective action required under Rule 1200-1-11-.06(6)(l), the SWMUs and AOCs identified in the Attachment to this fact sheet and the draft permit have been or shall be addressed through the requirements of the Federal Facility Agreement (FFA) for the Defense Depot Memphis Tennessee. As mentioned above, EPA, TDEC and the DLA entered into the FFA, effective March 6, 1995, to satisfy the requirements of Section 120(e)(2) of CERCLA and Section 3004(u) and (v) of RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA).

In accordance with the FFA, Section IX. RCRA/CERCLA INTEGRATION, any corrective action obligation under RCRA for the SWMUs and AOCs, as identified in the Attachment to this fact sheet and the draft permit, has been deferred to the CERCLA response action process. The DLA,

EPA and TDEC have decided on the CERCLA response actions, e.g., remedial and removal actions, and signed Decision Documents, i.e., Records of Decision, to address the corrective action requirements for the SWMUs and AOCs, which includes No Further Action determinations. It was agreed that these selected CERCLA response actions conducted pursuant to the FFA are protective of human health and the environment such that corrective action to address such releases, including any off-site releases, shall not be required under this permit. However, the permittee shall submit an annual update for any newly identified SWMU(s) and AOC(s) discovered, or for existing units, whenever there is a change in the status of a unit or area. All updates will automatically be incorporated into the permit. If a decision is made by the FFA parties that a unit or area will not be deferred to the CERCLA process, TDEC will determine if additional investigation or corrective action is necessary under the authority of the permit.

TECHNICAL CONTACTS:

For further information contact Mr. Michael A. Dobbs at 717-770-6950 or write to him at Defense Logistics Agency, 2001 Mission Drive, New Cumberland, Pennsylvania 17070-5000.

PUBLIC COMMENT

The regulations under Rule 1200-1-11-.07(7)(e) require that a 45-day comment period be instituted for each draft permit under the Hazardous Waste Management Act. The **comment period will begin on August 13, 2004**, which is the date of publication of the public notice in the major local newspaper of general circulation, **and will end on September 27, 2004**.

Copies of DDMT's application, the draft permit and fact sheet are available for public inspection at the Memphis/Shelby County Public Library - Cherokee Branch, 3300 Sharpe Ave., Memphis, Tennessee 38111(901-743-3655). These materials are also available for public inspection during normal business hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays, at the TDEC Memphis Environmental Assistance Center, Public Access Area, Perimeter Park, 2510 Mt. Moriah, Suite E-645, Memphis, TN 38115 (901-368-7939).

All persons who believe that the tentative decision to issue this permit is inappropriate must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by the end of the above comment period deadline. To submit written comments on this proposed action or to obtain further information, please contact Clayton Bullington; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L&C Tower; 401 Church Street; Nashville, TN 37243-1535; phone 615-532-0859 or e-mail to clayton.bullington@state.tn.us. Comments will also be received at the public hearing on September 14, 2004.

When the Division of Solid Waste Management (DSWM) makes a final permit decision to either issue, deny or modify the permit, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision. The final permit decision shall become effective upon signing by the Director of the DSWM.